

**North
American
National
Broadcasters
Association**

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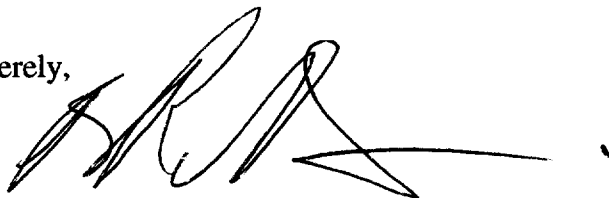
Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, DC 20554

Dear Mr. Caton:

On behalf of the North American National Broadcasters Association (NANBA), transmitted herewith for filing with the Commission are an original and eleven copies of its Reply Comments in MM Docket No. 87-268.

If there are any questions in connection with the foregoing, please feel free to contact me at (416) 205-8530.

Yours sincerely,



Bill Roberts
Secretary General

attached.

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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In the Matter of:

Advanced Television Systems
and Their Impact Upon the
Existing Television Broadcast Service

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MM Docket No.87-268

To: The Commission

REPLY COMMENTS OF THE NORTH AMERICAN NATIONAL BROADCASTERS
ASSOCIATION (NANBA)

Introduction

The North American National Broadcasters Association (NANBA) is a non-commercial association including representatives from Canada, the United States of America and Mexico. NANBA provides a framework for the identification, study and active solution of international questions affecting North American broadcasters. It has been operating as NANBA since 1978 and is incorporated under the Canadian Corporation Act (Part 2). Our head office is in Toronto.

Our Board includes the major networks in the U.S. and Canada, ABC, CBS, NBC, and CBC and CTV, as well as TBS, National Public Radio, PBS and Mexico's Televisa. In addition to the above organizations, our members and associate members include major U.S. cable programming networks such as ESPN and the Canadian communications company NetStar as well as the National Association of Broadcasters and Voice of America. NANBA's newest associate member is DIRECTV.

NANBA members are represented through an Advisory Council which brings together key people from the companies mentioned above. Its work is driven by a number of committees specializing in legal affairs, news and operations, sports, and technical issues, which report to the Advisory Council. NANBA works to represent North American broadcasters internationally and also works with other international broadcasting unions and associations to gain an effective voice in international fora on matters that affect broadcasting.

While NANBA's priorities have generally been in the area of copyright, satellite tariffs, technical broadcast standards, and journalistic practices and freedoms, we believe

that it is an appropriate time to expand our focus somewhat, in the context of the growing global economy, to work towards creating an international environment that is appropriate to and supports the growth and development of North American broadcasters.

Canadians, American and Mexicans have an excellent record of cooperation in the area of technical standards. The development of advanced television standards and their impact upon existing television broadcast services is of vital importance to all NANBA members and associate members. To that end, these reply comments are not only filed with the FCC, but also with the Canadian Task Force On the Implementation of Digital Television under the federal ministry of Canadian Heritage, and with the appropriate Mexican counterpart.

Comments

NANBA has reviewed the submissions of the Advanced Broadcasting Systems of Canada, Inc. (ABSOC) as submitted to the FCC on 10 July 1996, and of the Association For Maximum Service Television, Inc. filed with the FCC on behalf of 91 U.S. broadcast organizations (Broadcasters' Comments) on 11 July 1996. Both of these texts were filed in the context of the fifth further notice of proposed rule making in the above-captioned matter of advanced television systems. NANBA is in general agreement with these two documents and would formally urge the adoption of the ATSC DTV standard for all of North America.

Specifically, we agree with ABSOC that the adoption of a single, mandatory standard for over-the-air terrestrial TV broadcasting is in the public interest for all North Americans; that the standard selected should be technically advanced, proven and economically viable for this purpose; that the selection of the standard should enable the efficient use of the VHF/UHF broadcasting spectrum, both in the transition period and in a future all-digital world; and that related industry standards should be adopted that lead to interoperability between all delivery media and an economic, common receiver for the consumer. We further agree with the key arguments in the Broadcasters' Comments, specifically those referencing the ATSC DTV standard's technical "virtuosity" as it maximizes spectrum efficiency, interoperability and growth, and those which underscore that the consumer interests and the success of DTV require adoption of the ATSC standard.

To these remarks NANBA wishes to add or reinforce the following six points:

1. A North American ATSC DTV standard will provide the certainty that manufacturers, broadcasters and the public need to make digital investments. This will be a particular advantage to the NAFTA region as we collectively face international competition in new technologies.
2. The Grand Alliance system, while largely a U.S. creation, has had significant review by American, Canadian and Mexican broadcasters. It represents world-leading technology. Further delay in establishing a standard will only hurt North America's ability to participate optimally in the benefits of leadership associated with digital transition.
3. The recommended standard is an inclusive one: it contains both interlaced and progressive scanning formats which individually meet the needs of various affected industries.
4. The recommended standard would provide the North American public with an exciting new viewing experience: HDTV. It also would allow broadcasters to transmit multiple programs in standard definition plus data. This flexible framework would greatly serve the public.
5. Hundreds, if not thousands of Americans and Canadians have worked over eight years and expended hundreds of millions of dollars to fulfill the FCC's specific mandate: to recommend a new broadcast transmission standard. Canada's current Task Force On The Implementation of Digital Television represents a similar volunteer process. The result has been more successful than many anticipated: an all digital system that works over-the-air and through wired delivery technologies as well. It is the best video technology developed and for North American governments to not follow through on setting a compatible standard would be a failure of commitment.

6. North America is in a competitive situation with other increasingly integrated economies. Broadcasting is at the heart of this development. It is time to move ahead in concert, with confidence and deliberate speed. The public interest warrants no less.

In sum, NANBA urges the pan-North American adoption of the ATSC DTV standard. The FCC is in a position to demonstrate resolve and leadership in just this quest. NANBA further requests of Canadian and Mexican authorities to similarly adopt this compatible standard.

Respectfully submitted,

By: 

Bill Roberts
Secretary General

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August 9, 1996